

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

STATE OF IOWA ex rel.
THOMAS J. MILLER,
ATTORNEY GENERAL OF IOWA,
99AG25112

Plaintiff,

v.

PUBLIC SAFETY COMMUNICATIONS
INC, an Iowa corporation, dba Public Safety, Inc.
and Public Safety; and

ANDY D. CONSTANTINE in his corporate
capacity as an officer of Public Safety
Communications, Inc., and individually;

Defendants.

Equity No. CE 62195

PETITION IN EQUITY

FILED
POLK COUNTY IA
2009 MAY 20 AM 8:34
CLERK DISTRICT COURT

The State of Iowa ex rel. Attorney General Thomas J. Miller, through Assistant Attorneys General Steve St. Clair and John McCormally, states as follows for its cause of action against Public Safety Communications, dba Public Safety, Inc. and Public Safety, and Andy D. Constantine, in his corporate and individual capacities:

INTRODUCTION

1. Public Safety Communications, Inc. (hereinafter "PSC"), an Iowa corporation headquartered in Des Moines, Iowa, makes fundraising calls to residents of Iowa and other states from a phone room in Des Moines. The calls request donations to charities or non-profits that have contracted to let PSC solicit contributions in their name. In exchange, the charity or non-profit receives between 10% and 20% of total donations, and PSC keeps the remainder. PSC employs many telemarketers to solicit donations from Iowans. PSC provides the telemarketers scripts, and at least

some of the scripts are misleading. Misleading aspects of the scripts are then magnified and supplemented by telemarketers whose rate of pay depends upon their success at persuading people to donate. These telemarketers mislead Iowans about who they are, the nature of their fundraising effort, how donated funds are used, and the proportion of each donated dollar that goes to the worthy cause that motivated the donation, among other things. Generous donors in Iowa and elsewhere are being subjected to the ongoing abuse of their charitable impulses by these defendants, and the Attorney General seeks to end the abuse.

VENUE

2. Venue is proper in Polk County, Iowa, because Defendants have engaged and, upon information and belief, continue to engage in the activities that are the subject of this Petition in Polk County, Iowa. Moreover, upon information and belief Defendants do business in Polk County and one or more victims of the practices in question reside in Polk County. Iowa Code § 714.16 (10) (2009).

PARTIES

3. The Iowa Attorney General is authorized to bring this action on behalf of the State of Iowa by Iowa Code §§ 714.16 (7) and 714.16A (1) (2009).

4. Public Safety Communications, Inc. is an Iowa Corporation headquartered in Des Moines, and incorporated in the State of Iowa in 1990. PSC operates a call center at 101 East Sheridan, Des Moines, Iowa. PSC filed fictitious name certification (as Public Safety, Inc.) in Iowa in January of 2005. PSC was administratively dissolved by the Iowa Secretary of State in 2004 and 2006 for failing to file its biennial report, but was reinstated both times after filing the required documents. PSC was again administratively dissolved in August 2008, and is currently listed as inactive by the Iowa Secretary

of State, although upon information and belief PSC's fundraising operations continue unabated.

5. Andy D. Constantine is President of PSC, and has been since its founding. Mr. Constantine actively directs the fundraising and other activities of PSC. Mr. Constantine is responsible in his individual and corporate capacities for the violations of law set forth herein.

JURISDICTION

6. The Iowa Consumer Fraud Act, Iowa Code § 714.16 (2)(a) (2009) ("the Consumer Fraud Act") provides in pertinent part:

The act, use or employment by a person of an unfair practice, deception, fraud, false pretense, false promise, or misrepresentation, or the concealment, suppression or omission of a material fact with intent that others rely upon the concealment, suppression, or omission, in connection with the lease, sale, or advertisement of any merchandise or the solicitation of contributions for charitable purposes, whether or not a person has in fact been misled, deceived, or damaged, is an unlawful practice.

7. Iowa Code § 714.16 (1) provides the following definitions:

(f) "Deception" means an act or practice which has the tendency or capacity to mislead a substantial number of consumers as to a material fact or facts.

(n) "Unfair practice" means an act or practice which causes substantial, unavoidable injury to consumers that is not outweighed by any consumer or competitive benefits which the practice produces.

8. Iowa Code § 714.16 (7) provides, in pertinent part:

Except in an action for the concealment, suppression, or omission of a material fact with intent that others rely upon it, it is not necessary in an action for reimbursement or an injunction, to allege or to prove reliance, damages, intent to deceive, or that the person who engaged in an unlawful act had knowledge of the falsity of the claim or ignorance of the truth..

9. In describing remedies under the Consumer Fraud Act, Iowa Code subsection 714.16 (7) provides in pertinent part as follows:

If it appears to the attorney general that a person has engaged in, is engaging in, or is about to engage in a practice declared to be unlawful by this section, the attorney general may seek and obtain in an action in a district court a temporary restraining order, preliminary injunction, or permanent injunction prohibiting the person from continuing the practice or engaging in the practice or doing an act in furtherance of the practice. The court may make orders or judgments as necessary to prevent the use or employment by a person of any prohibited practices, or which are necessary to restore to any person in interest any moneys ... which have been acquired by means of a practice declared to be unlawful by this section ...

In addition to the remedies otherwise provided for in this subsection, the attorney general may request and the court may impose a civil penalty not to exceed forty thousand dollars per violation against a person found by the court to have engaged in a method, act, or practice declared unlawful under this section; provided, however, a course of conduct shall not be considered to be separate and different violations merely because the conduct is repeated to more than one person. In addition, on the motion of the attorney general or its own motion, the court may impose a civil penalty of not more than five thousand dollars for each day of intentional violation of a ... permanent injunction issued under authority of this section.

10. Iowa Code §§ 714.16A (1) & (3) (2009) provide, respectively:

If a person violates section 714.16, and the violation is committed against an older person, in an action by the attorney general, in addition to any other civil penalty, the court may impose an additional civil penalty not to exceed five thousand dollars for each such violation.

As used in this section, '*older person*' means a person who is sixty-five years of age or older.

FACTUAL ALLEGATIONS

11. Defendant Andy Constantine and Betty Constantine incorporated defendant corporation Public Safety Communications, in 1990. The Constantines are the sole officers and directors of PSC.

12. Defendants contract to make solicitations on behalf of various organizations. These client organizations include (among various others), Handicapped Children's Services of America and American Veterans Network, both of which are programs of Shiloh International Ministries; the

Association of Firefighters and Paramedics; and State Police Officers Council.

13. Defendants operate a telephone call center which engages in telemarketing for charitable donations. Upon information and belief, PSC collected about \$1.5 million in donations in a recent year (2006), and raises approximately that amount or more each year.

14. In order to evaluate the content of phone solicitations directed to prospective donors by PSC, it is important to recognize that telephone fundraising efforts enjoy enhanced success if prospective donors believe:

- a) that the individual soliciting the donation is himself or herself part of the charitable organization, or is volunteering to assist the charity in raising money;
- b) that the call is part of a local fundraising effort involving a charity that is active in the donor's locale;
- c) that the fundraising is performed infrequently, for example, as part of an annual drive; and/or
- d) that a substantial portion of each donated dollar goes to the worthy cause, as opposed to paying the salaries and expenses of a telemarketing operation.

15. Calls made by PSC employees frequently contain misrepresentations, material omissions, or other deceptive features, for which Defendants are liable; such calls, individually and as part of the overall fundraising scheme, constitute unfair practices, for which Defendants are liable; and the overall fundraising arrangement, including the maintenance of a system of solicitation that foreseeably and consistently generates deceptive and abusive solicitations, is itself a deceptive and/or unfair practice for which Defendants are liable. Upon information and belief, older Iowans are disproportionately represented both among the recipients of PSC's solicitations and among the donors, in part because they are more likely to be home when solicitation calls are made.

SHILOH INTERNATIONAL MINISTRIES

16. PSC contracts with Shiloh International Ministries ("Shiloh") to solicit on behalf of Shiloh's programs, including "Handicapped Children's Services of America" and "American Veterans Network." According to the website of Charity Navigator, a respected non-profit organization that rates charities on the basis of such factors as the amount of donated money spent on fundraising rather than on the underlying charitable mission, in 2007 Shiloh committed only about 4% of its revenues to charitable purposes ("program expenses"), and Shiloh received the lowest ranking, rating zero stars on a four-star assessment scale. (See CharityNavigator.org)

17. When making solicitations for Shiloh, PSC keeps 80% of all funds raised. Thus, of every dollar contributed in response to a PSC call soliciting donations for Shiloh, twenty cents goes to Shiloh, and of that twenty cents Shiloh devotes less than one penny to the charitable purpose.

HANDICAPPED CHILDREN'S SERVICES OF AMERICA

18. On March 12, 2009, a PSC employee directed a solicitation call to a resident of Polk County, Iowa on behalf of Handicapped Children's Services of America ("HCSA"), a program of Shiloh International Ministries. The Consumer Protection Division has obtained a recording of this call.¹ The call was misleading in the following ways, among others.

- a. The fact that the call was being made by an employee of Public Safety Communications, Inc., a professional fundraiser, was not properly disclosed;
- b. The solicitor indicated that he was calling for Handicapped Children's Services, and referred to the charity's activities using the pronoun "we," implying a

¹ A recording of the phone call in question is contained on the CD attached hereto as Attachment I, and a copy of a transcript of the call is attached hereto as Attachment II. Certain identifying information has been redacted.

direct connection between the caller and the charity;

- c. The solicitor stated that "eighty percent" of contributions went to the benefit of the charitable organization, when in fact 20% goes to the charity; and
- d. The solicitor stated "[w]e're helping handicapped children here in Iowa," and when asked if contributed money stayed in Des Moines, the solicitor stated that the contribution benefits "the State of Iowa." However, Shiloh reports that it has never expended any money in the state of Iowa for program services.

19. A person who makes a pledge to Handicapped Children's Services of America in response to a telephone solicitation from PSC is directed to mail the donation to HCSA at a Des Moines-area address. Upon information and belief, the primary reason that a Des Moines-area address is used is to create the impression in the minds of donors that the charity's connection to Iowa is greater than is in fact the case.

AMERICAN VETERANS NETWORK

20. On February 2, 2009, a PSC employee directed a solicitation call to a resident of Polk County, Iowa on behalf of American Veterans Network ("AVN"), a program of Shiloh International Ministries. The Consumer Protection Division has obtained a recording of this call.² The call was misleading in the following ways, among others.

- a. The fact that the call was being made by an employee of Public Safety Communications, Inc., a professional fundraiser, was not properly disclosed;
- b. The solicitor said: "This is American Veterans here in Des Moines," implying that the caller was a representative of the charity itself and that the charity was located in Des Moines;

² A recording of the phone call in question is contained on the CD attached hereto as Attachment I, and a copy of the transcript of the call is attached hereto as Attachment III. Certain identifying information has been redacted.

- c. When asked how much of the money went to veterans, the solicitor replied "I don't know – I know we're a 501 (c)(3) non-profit organization." This statement reinforces the misconception that the caller is directly connected with AVN, implies governmental approval of the organization's activity, and omits the fact that only 20% of contributions go to the charitable organization;
- d. The solicitor reinforced the false impression that he was directly tied to the charity by referring to AVN's activities in the first person (e.g., "we help out disabled veterans here in Iowa");
- e. When asked if at least half of the donation went to the charity, the solicitor replied "probably." Again, only 20% of the money collected went to the charitable organization;
- f. When asked if money from a contribution stayed in Des Moines, the solicitor responded that "this is a national program, but we do help out all the veterans here in Iowa." But far from helping out all the veterans here in Iowa, Shiloh has reported that it has never expended any money in the state of Iowa for program services.

21. A person who makes a pledge to American Veterans Network in response to a telephone solicitation from PSC is directed to mail the donation to AVN at a Des Moines-area address. Upon information and belief, the primary reason that a Des Moines-area address is used is to create the impression in the minds of donors that the charity's connection to Iowa is greater than is in fact the case.

ASSOCIATION FOR FIREFIGHTERS AND PARAMEDICS

22. The Association for Firefighters and Paramedics ("AFP") is a PSC client. According to the website of Charity Navigator, in 2007 AFP committed only about 3% of its revenues to charitable purposes ("program expenses"), and AFP received the lowest ranking, rating zero stars on a four-star assessment scale.

23. When making solicitations for AFP, PSC keeps 90% of all funds raised. Thus, of every dollar contributed in response to a PSC call soliciting donations in AFP's name, ten cents goes to AFP, and of that ten cents AFP devotes less than one-half of one cent to the charitable mission.

24. On October 8, 2008, a PSC employee directed a solicitation call to a resident of Polk

County, Iowa on behalf of AFP. The Consumer Protection Division has obtained a recording of this call.³ The call was misleading in the following ways, among others.

- a. The fact that the call was being made by an employee of Public Safety Communications, Inc., a professional fundraiser, was not properly disclosed;
- b. The solicitor repeatedly implied that he was part of the charitable endeavor by referring to AFP's activities in the first person ("we" and "our");
- c. The solicitor stated that "eighty, eighty-five percent" of contributions went to the benefit of the charitable organization, when in fact only 10% goes to the charity;
- d. When asked if money from a contribution stayed in Des Moines, the solicitor stated that the donated money benefitted "the state" and "our community burn centers here in, mostly here in Des Moines." Upon information and belief, in the past AFP has made only minimal contributions to Iowa-based entities, and has not made any such contributions in Iowa since 2006.

25. A person who makes a pledge to the Association For Firefighters and Paramedics in response to a telephone solicitation from PSC is directed to mail the donation to AFP at a Des Moines-area address. Upon information and belief, the primary reason that a Des Moines-area address is used is to create the impression in the minds of donors that the charity's connection to Iowa is greater than is in fact the case.

STATE POLICE OFFICERS COUNCIL

26. The State Police Officers Council (SPOC) is a PSC client. According to its Form 990 filing with the Internal Revenue Service, SPOC is a 501(c)(3) non-profit organization. Its primary exempt purpose is as a labor organization, and the only exempt purpose cited on its 990 Form is

³ A recording of the phone call in question is contained on the CD attached hereto as Attachment I, and a copy of a transcript of the call is attached hereto as Attachment IV. Certain identifying information has been redacted.

“negotiating labor contracts for its members in collective bargaining with the State of Iowa.” The 990 Form also states that SPOC “represents its members in collective bargaining and employer/employee relations.” SPOC evidently reports no other charitable purpose to the IRS. SPOC expended approximately \$225,000 for the reported exempt purpose in 2006, and lists no other program expenses. SPOC also reported receipts of \$209,000 from “membership dues,” and \$72,000 in revenue from “royalties.”

27. In its calendar year 2006 filing with the Attorney General, PSC reports that it raised \$307,128 on behalf of SPOC, and kept \$229,000. This means that PSC retains about 75% of all money raised in SPOC’s name. The amount of the funds directed to SPOC by PSC corresponds to the “royalty” revenue reported by SPOC to the IRS (\$72,000.00).

28. The fundraising script PSC uses to solicit for SPOC states that funds contributed to SPOC “support the child identification program, which helps bring lost or missing children back to their loved ones.” Although the above-referenced tax filings do not reflect expenditures for a child identification program, the materials mailed out to Iowans who make a pledge to a PSC solicitor include a one-page child identification form that the donor may fill out in relation to a particular child, and then keep for use in the event that the child goes missing. Plaintiff does not currently know the extent to which this distribution of the form has helped to “bring lost or missing children back to their loved ones.”

29. On February 2, 2009, a PSC employee directed a solicitation call to a resident of Polk County, Iowa on behalf of SPOC. The Consumer Protection Division has obtained a recording of this call.⁴ The call was misleading in the following ways, among others.

⁴ A recording of the phone call in question is contained on the CD attached hereto as Attachment I, and a copy of a transcript of the call is attached hereto as Attachment V. Certain

- a. The fact that the call was being made by an employee of Public Safety Communications, Inc., a professional fundraiser, was not properly disclosed;
- b. The solicitor indicated that he was *at* SPOC, implying a direct connection between the caller and the charity, and implying a law enforcement connection;
- c. The solicitor repeatedly reinforced the false impression that he was with SPOC by referring to SPOC's activities in the first person ("we," "us," and "our");
- d. When asked how much of the contribution would go to SPOC, the solicitor stated that "it all goes to the child identification program...[f]or printing up those identification forms... [f]ingerprinting and photographing of the children..." In fact, only 25% of the money raised by PCS goes to SPOC at all, and, according to SPOC's tax filing, the primary use of the donated funds relates to representation of SPOC members in management/labor matters; and
- e. When asked whether he was a volunteer, the solicitor falsely claimed that he was.

30. Neither all nor any part of the application for injunctive relief herein has previously presented to and refused by any court or justice. Iowa R. Civ. P. 1.1504.

31. In an action by the state, no security shall be required of the state. Iowa R. Civ. P. 1.207.

CONSUMER FRAUD ACT VIOLATIONS **COUNT I**

32. Paragraphs 1 through 31 are incorporated herein by reference.

33. Defendants' fundraising practices violate the prohibition of Iowa Code § 714.16 (2)(a) against misleading, deceptive, unfair, and omissive acts and practices, and otherwise violate that provision of Iowa law by making misleading affirmative representations about how donations would be used.

34. Although it is not necessary to establish reliance, damages or intent to deceive to obtain

identifying information has been redacted.

injunctive relief or reimbursement under the Consumer Fraud Act (*see* paragraph 8 above), establishing these factors, particularly intent, is nevertheless relevant *inter alia* to the Court's determination of the appropriate scope of injunctive relief and the appropriate amount of civil penalties. Those acts and practices of Defendants in violation of subsection (2)(a) of the Consumer Fraud Act as alleged in this Count did in fact induce reliance on the part of consumer victims, did in fact cause damage to consumers (and to other charitable organizations and their beneficiaries), and/or were in fact intentional.

COUNT II

CONSUMER FRAUDS COMMITTED AGAINST OLDER PERSONS

35. Paragraphs 1 through 31 above are incorporated herein by reference.

36. On information and belief, many of the Consumer Fraud Act violations for which the Defendants are responsible were committed against older persons and give rise to the additional civil penalty provided for in section 714.16A.

PRAYER

Plaintiff prays the Court grant the following relief:

A. Pursuant to Iowa Code § 714.16 (7), and upon further request by Plaintiff addressed to the Court, enter a temporary restraining order and preliminary injunction restraining Defendants, and each of them, and (as applicable) each such Defendant's directors, officers, principals, partners, employees, agents, servants, representatives, subsidiaries, affiliates, successors, assigns, merged or acquired predecessors, parent or controlling entities, and all other persons, corporations and other entities acting in concert or participating with that Defendant who have actual or constructive notice of the Court's injunction, from engaging in the deceptive, misleading, omissive, and unfair practices alleged in this

Petition or otherwise violating the Iowa Consumer Fraud Act, such injunctive relief to include *inter alia* a requirement that Defendants record all solicitation calls and make such recordings available to the Attorney General upon request and/or that Defendants refrain from continuing to engage in any solicitation of donations in Iowa or from Iowa.

B. Pursuant to Iowa Code § 714.16 (7), after trial on the merits, make permanent the above-described injunctions, expanding their provisions as necessary by including *inter alia* such "fencing in" provisions as are reasonably necessary to ensure that Defendants and other enjoined persons and entities do not return to the unlawful practices alleged herein, or commit comparable violations of law.

C. Pursuant to Iowa Code § 714.16 (7), enter judgment against Defendants, jointly and severally, for amounts necessary to restore to Iowa consumers all money acquired by means of acts or practices that violate the Consumer Fraud Act, and/or to effectuate the charitable giving intended by Iowa consumers in donating such money.

D. Pursuant to Iowa Code § 714.16 (7), enter judgment against Defendants, jointly and severally, for such additional funds as are necessary to ensure complete disgorgement of all ill-gotten gain traceable to the unlawful practices alleged herein.

E. Pursuant to Iowa Code § 714.16 (7), enter judgment against Defendants, jointly and severally, for up to \$40,000.00 for each separate violation of the Consumer Fraud Act.

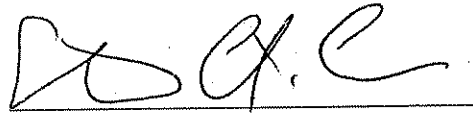
F. Pursuant to Iowa Code § 714.16A, enter judgment against Defendants, jointly and severally, for an additional civil penalty not to exceed \$5,000.00 for each violation of the Consumer Fraud Act committed against an older person.

G. Award Plaintiff interest as permitted by law.

H. Pursuant to Iowa Code § 714.16 (11), enter judgment against Defendants, jointly and severally, for attorney fees, state's costs and court costs.

I. Grant such additional relief as the Court deems just and equitable.

Respectfully submitted,
Thomas J. Miller
Attorney General of Iowa

A handwritten signature in black ink, appearing to read 'Steve St. Clair', is written over a horizontal line.

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**CD: RECORDINGS OF THE SOLICITATION
CALLS REFLECTED IN TRANSCRIPTS
(ATTACHMENTS II - V)**

**State of Iowa
Department of Justice
Consumer Protection Division
1305 E. Walnut
Des Moines, Iowa 50319**

ADDRESS SERVICE REQUESTED

ATTACHMENT I

HANDICAPPED CHILDREN SERVICES

3-12-09

PD: Prospective Donor

RB: Randy Baker

PD: Hello?

RB: Hello?

PD: Hello?

RB: Hi [NAME]?

PD: This is [NAME].

RB: [NAME], uh Randy Baker calling for Handicapped Children Services. How are ya?

PD: Oh, OK.

RB: Well good. We're helping handicapped children here in Iowa with special therapy equipment and medical care. If we mailed everything first with a thank you letter, about this time next month in April around the 10th, could you help with twelve or fifteen dollars?

PD: And this was Handicapped Children Services?

RB: Yes.

PD: OK.

RB: Right here in Des Moines.

PD: Oh, so have I given before?

RB: Not that I know of.

PD: Oh, OK. And where are you located, in Des Moines?

RB: Yeah we're right over here by Second Ave, we're on, right off of Second Avenue by North High.

PD: OK. And Handicapped Children Services, OK. Um, I can probably do fifteen.

RB: That'd be great...

PD: But can you tell me of the fifteen dollars, how much will go to the Handicapped Children's?

RB: Uh, believe 80%.

PD: 80% will go to them?

RB: Right.

PD: OK, well that sounds good. Does it stay here though in Des Moines?

RB: Right.

PD: OK.

RB: It's for the state of Iowa.

PD: Oh, for the whole state?

RB: Yeah.

PD: Oh OK. Well that still is good. Um, are you a volunteer?

RB: No ma'am, I get paid to do this.

PD: OK. Go ahead.

RB: OK. P. O. Box [NUMBER]?

PD: Yes.

RB: OK. I do need a verifier to check, check this, that way we don't call you twice.

PD: OK.

V?: Hi [NAME]?

PD: Yes.

V?: Helping out with fifteen dollars?

PD: Yes.

V?: You're at P. O. Box [NUMBER]?

PD: Yes.

V?: [NUMBER]?

PD: Yes.

V?: We'll mail that to you in about three to four days. Have you mail that back to us in about a week or two?

PD: I sure can.

V?: Thank you.

PD: Um hum (affirmative). Bye.

AMERICAN VETERANS NETWORK

2-2-09

PD: Prospective Donor

BP: Bill Petithory

Please hold while...

BP: Hello is [NAME] there?

PD: This is [NAME].

BP: [NAME] this is American Veterans here in Des Moines. I want to thank you for your support last year. You helped out our paralyzed veterans with a \$12.00 pledge.

PD: I'm sorry, who is this?

BP: American Veterans Network here in Des Moines, [NAME], we help out disabled veterans here in Iowa.

PD: And what's your name?

BP: My name is Bill Petithory.

PD: Oh OK.

BP: Uh if I get you out a tax receipt again this year [NAME], uh veterans decal and a pledge packet about this time next month, can your disabled veterans count on you for a small twelve dollar pledge again this year, one time?

PD: So I have given before then?

BP: Yeah you helped out last year.

PD: With twelve dollars?

BP: Yes ma'am.

PD: Oh and where are you located?

BP: We're over here by North High School...

PD: Oh.

BP: ...we're right off Second Avenue.

PD: Oh.

BP: The Birdland Marina area.

PD: OK well of the twelve dollars, how much would go to the veterans?

BP: I don't know that -----, I know we're a 501C3 non-profit organization [NAME].

PD: Oh my.

BP: I don't, you know, I can't quote you an exact, now I know they get most of it.

PD: Do you think it's more than half?

BP: Uh it probably is but there again I can't answer that to be exactly right, you know?

PD: OK, can you tell me how much...

BP: I know that all that information comes in the packet, that should have come in the packet we mailed you last year.

PD: Oh. OK.

BP: It's got all the board members, the presidents, uh, the president of American Veterans Network you know, all what the money is being used for all the time so...

PD: Does it stay here in Des Moines?

BP: Well this is, this is a national program uh, we do help out all the veterans here in Iowa, OK? We help out all over. We also call Colorado, uh we call Alabama, we call Virginia and Oklahoma.

PD: Oh...

BP: OK.

PD: Well how do the veterans get this money?

BP: Well the veterans uh, the American Veterans Network disperses it. It helps out with wheelchairs, it helps to build the ramps, making them wheelchair accessible. It also helps to provide entertainment for veterans who are hospitalized and confined in the nursing homes.

PD: Oh that's a good, good deal then.

BP: Yeah they got, they got entertainment that goes to see those folks quite a bit, you know.

PD: Well neat. O...

BP: So it helps out in a lot of ways.

PD: OK. Um, are you a volunteer then?

BP: Me?

PD: Uh hum (affirmative).

BP: No I make minimum wage doing this.

PD: OK.

BP: I come in here a couple of hours a day when I ain't got nothing else to do so, it's too cold to work outside so I'm working out here for a couple of hours.

PD: It is terribly cold outside today.

BP: Get out of here and go get my brakes fixed on my truck some today some time I hope.

PD: Well um, twelve dollars is all I can, I can afford.

BP: That's fine. That's super. I got you Post Office Box still uh, [NUMBER]?

PD: Yes.

BP: OK. [NAME] I want to thank you for your support again now, before I let you go, I got to transfer you back to the mail room real quick. We do this, this way they can take you off the list and we don't accidentally call you twice, OK?

PD: That sounds good.

BP: Thanks [NAME]. Hold the line, God bless and thanks for helping. I'm going to transfer you to the mail room right now.

PD: OK.

MR: Hello, hi [NAME]?

PD: This is...

MR: Helping out with twelve dollars. Have you at P. O. Box uh [NUMBER]?

PD: Yes.

MR: We'll get it to you in three or four days. Can you send then back when you receive it?

PD: Yes.

MR: Thank you.

PD: Um hum (affirmative). Bye.

ASSOCIATION FOR FIREFIGHTERS & PARAMEDICS

10-8-08

PD: Prospective Donor

KT: Kory Thomas

PD: Hello?

KT: Hello?

PD: Hello?

KT: Yeah, [NAME]?

PD: This is [NAME].

KT: All right ma'am. Kory Thomas calling with Public Safety for the Association of Firefighters and Paramedics. How are you this morning?

PD: Very good. Thank you.

KT: Good to hear. The reason for my call, we're currently underway with our sponsorship drive once again supporting our burnt children in Iowa in the burn centers, reaching back out to you. Thanking you for your twelve dollar support you provided last year. We do appreciate the help from the community and we're hoping that we can count on your continued support.

PD: Oh, OK, so I have given before and it was twelve dollars?

KT: Yeah, last year you helped out with twelve dollars.

PD: OK.

KT: And we still mail to P. O. Box [NUMBER], here in Des Moines?

PD: OK, where, where are you located then?

KT: Here in Des Moines.

PD: Oh, OK.

KT: Yeah.

PD: OK.

KT: Over here by North High School.

PD: OK and I gave twelve dollars last year. I can go ahead and give twelve dollars but can you tell me how much of the twelve dollars will to the Association for, was it Police and Firefighters Association?

KT: Association for Firefighters and Paramedics. It's, eighty, eighty-five percent.

PD: Oh, OK. And does it stay here though in Des Moines?

KT: Well it's for the state.

PD: Oh, for the whole state?

KT: But it, but it more or less helps out our community.

PD: Oh, OK. OK.

KT: For our community and our burn centers here in, you know, mostly here in Des Moines, but we do mail you out all the information first...

PD: Oh, OK.

KT: And it's one hundred percent tax deductible sponsorship that you mail back by check or money order after you receive the packet. Nothing over the phone.

PD: Oh, OK. Are you a firefighter?

KT: No. I'm just calling on behalf of the association.

PD: OK, well go ahead and send that out and I can do twelve dollars.

KT: OK and again that [NUMBER], the P. O. Box?

PD: Yes.

KT: Great. And so we don't give you a second call and bother you the rest of this year, my verifier will just double check your name and your mailing information. This way we get you off of our calling list.

PD: OK.

KT: Thank you again for your continued support and one moment, I'm going to transfer you now...

PD: That sounds good.

KT: It's only going to be about three seconds.

PD: OK.

You are the next...

V?: Good morning, this [NAME]?

PD: Yes.

V?: This is Ashley ---- with Public Safety, were you helping out with twelve dollars for the Association For Firefighters and Paramedics?

PD: Yes.

V?: We appreciate. P. O. Box [NUMBER]?

PD: Yes.

V?: OK you'll receive your twelve dollar receipt and an envelope for you to mail your twelve dollar check. Can you return that when you receive it?

PD: Yes.

V?: Thank you, have a great day.

PD: You too.

V?: Thanks.

PD: Bye.

V?: Bye.

STATE POLICE OFFICER'S COUNCIL

2-2-09

PD: Prospective Donor

JS: Joseph Schuler

JS: Hi, can I please speak with [NAME]?

PD: This is [NAME].

JS: Hi [NAME] this is Joseph Schuler at State Police Officer's Council. How are you doing today?

PD: I'm good. I'm sorry I didn't get your name?

JS: Joseph Schuler.

PD: OK.

JS: Police Officer's Council. Now [NAME] I won't take up a lot of your time. We wanted to call and say thank you for the donation that you gave us last year for our child identification program we sponsor. That's people like you that make the program possible every single year and we were just doing our benefit drive [NAME] for 2009 hoping that we could count on your continued support. If we went ahead and got you that pledge packet with receipt, official decal and return envelope out to you in the mail again, like we did last year, can we count on you this year one more time here in about a month. We really could use the help.

PD: OK, so I have given before?

JS: Yeah. We showed you helped us out last year about this time with our bronze package, which is twenty-five dollar pledge for the year. We were hoping that'd be OK for 2009.

PD: Well, where are you located?

JS: We're here in Des Moines. We're right, if you're familiar with, I see you're here in Des Moines as well, we just have a P. O. Box for the address but we're right by North High School.

PD: Oh, OK. OK. OK I know I can't do twenty-five with the economy it just...

JS: We do have a patrons pledge of fifteen this year, would that be OK?

PD: That would be a lot better.

ATTACHMENT V

JS: Excellent.

PD: Can I ask you though, of the fifteen dollars how much will go to the State Police Officer's Council, is that it?

JS: Oh it, it all goes to the child identification program. For printing up those identification forms. Fingerprinting and photographing of the children that we have here.

PD: So it all goes?

JS: Yep.

PD: OK.

JS: And are we still sending it out to you at P. O. Box [NUMBER]?

PD: Yes. Is, does the money stay here in Des Moines?

JS: It is an Iowa program. It's for the state...

PD: Oh OK.

JS: ...but it's just for Iowa. It's not nationwide.

PD: OK, good. Good.

JS: So it helps out all ninety-nine counties here.

PD: OK good. Are a volunteer?

JS: Yes.

PD: OK. Yeah my P. O. Box is [NUMBER].

JS: OK.

PD: And then my zip code is [NUMBER]. And you said about a month from now?

JS: Oh yeah. Well you'll get it in about three or four days but then you got about a month to get back to us.

PD: OK good.

JS: OK [NAME] well I'm going to have my verifier get on the line with real quick and

double check that P. O. Box again so we don't bother you twice this year.

PD: OK.

JS: All right. Thank you [NAME].

PD: You're welcome.

V?: Hi is this [NAME]?

PD: Yes this is.

V?: This Ashley ----. Did you commit to the fifteen dollars?

PD: Yes.

V?: We appreciate it. P. O. Box [NUMBER]?

PD: Yes.

V?: Des Moines?

PD: Um hum.

V?: You'll get your receipt and envelope for you to mail your check or money order.
Can you return that when you receive it?

PD: The person that I just spoke to said that I could send it in, in like a month.

V?: Within two to three weeks. Is that going to be OK for ya?

PD: Yeah that's fine. I can try. Yes.

V?: Is that OK?

PD: Um hum.

V?: Thanks. Have a good day.

PD: Bye.

V?: Bye.